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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:	
SECURITIES INVESTOR	:	
PROTECTION CORPORATION,	:	
	:	
Plaintiff-Appellant,	:	SIPA LIQUIDATION
	:	Adv. Pro. No. 08-01789 (BRL)
v.	:	
	:	(Substantively Consolidated)
BERNARD L. MADOFF INVESTMENT	:	
SECURITIES LLC,	:	
	:	
Defendant.	:	
	:	
-----	x	
	:	
In re:	:	
	:	
BERNARD L. MADOFF,	:	
	:	
Debtor.	:	
	:	
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**OBJECTION TO TRUSTEE’S MOTION FOR ENTRY OF AN
ORDER (I) APPROVING LITIGATION CASE MANAGEMENT
PROCEDURES FOR AVOIDANCE ACTIONS AND
(II) AMENDING GLOBAL PROTECTIVE ORDER**

Herbert Barbanel, Alice Barbanel and Lauri Ann Schwartz-Barbanel (collectively,
the “Barbanels”) hereby object to the Trustee’s Motion for Entry of An Order (I)

Approving Litigation Case Management Procedures for Avoidance Actions and (II) Amending Global Protective Order (hereinafter the “Motion”) filed October 21, 2010 by the Trustee for the liquidation of Bernard L. Madoff Investment Securities LLC (“BLMIS”). The Barbanels incorporate by reference herein and join in the Objection to the Motion filed by Davis Polk & Wardwell LLP on behalf of Sterling Equities Associates and certain affiliates. However, like the vast majority of other Madoff customers, the Barbanels do not know whether the Motion will affect them, because the Trustee has not yet filed the thousand Avoidance Actions that are the subject of the Motion. Accordingly, the Barbanels cannot know whether they will be defendants in any future Avoidance Action. Nonetheless, the Barbanels file this Objection to protect their rights in the event that the Trustee chooses to name them as defendants in a future Avoidance Action.

Dated: New York, New York
November 4, 2010

PHILLIPS NIZER LLP

By: /s/ Chryssa V. Valletta
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